

Courtney Angeli, OSB No. 941765  
E-mail: [courtney@baaslaw.com](mailto:courtney@baaslaw.com)  
Angela Ferrer, OSB No. 140814  
E-mail: [angela@baaslaw.com](mailto:angela@baaslaw.com)  
BUCHANAN ANGELI ALTSCHUL  
& SULLIVAN LLP  
921 SW Washington Street, Suite 516  
Portland, OR 97205  
T: 503.974.5015  
F: 971.230.0337

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

A.B.,

Case No. 3:21-cv-311-HZ

Plaintiff,

v.

**DR. JASON CAMPBELL and OREGON  
HEALTH & SCIENCE UNIVERSITY,**

**DEFENDANT DR. JASON  
CAMPBELL'S SECOND  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING**

Defendants

**LR 7-1 CERTIFICATION**

Pursuant to Local Rule 7-1, counsel for defendant Dr. Jason Campbell ("Dr. Campbell") has conferred with counsel for plaintiff A.B. and counsel for Oregon Health & Science University, and the parties do not oppose this motion.

**MOTION**

Dr. Campbell moves the Court for a 30-day extension of the current deadline to file a responsive pleading to the claims set forth in plaintiff's Complaint (ECF 1) ("Complaint") from the current deadline of April 22, 2021 to May 22, 2021.

The extension is requested because counsel for Dr. Campbell and counsel for plaintiff are in the process of working out a tentative settlement. Dr. Campbell is also addressing the possibility of new counsel substituting for current counsel as a result of insurance coverage if a settlement is not promptly reached. The extension of time would allow sufficient time for settlement discussions and clarification of whether new counsel is required due to insurance coverage.

Defendant's first motion for extension of time to file a responsive pleading was granted on March 15, 2021 extending the deadline from March 23, 2021 to April 22, 2021.

This motion, which is unopposed, is made in good faith and not for the purpose of delay. Based on the foregoing, Dr. Campbell respectfully requests that the Court grant his motion and issue an order allowing a 30-day extension of the deadline for Dr. Campbell to file a responsive pleading to plaintiff's Complaint, to May 22, 2021.

DATE: April 19, 2021

BUCHANAN ANGELI ALTSCHUL  
& SULLIVAN LLP

s/ Courtney Angeli

Courtney Angeli, OSB No. 941765  
Email: [courtney@baaslaw.com](mailto:courtney@baaslaw.com)  
Angela Ferrer, OSB No. 140814  
Email: [angela@baaslaw.com](mailto:angela@baaslaw.com)  
T: 503-974-5015

*Attorneys for Defendant Dr. Jason Campbell*